

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TYRONE J. LLOYD,	)	
	)	
Plaintiff,	)	Case no. 08CV3059 PH
	)	
v.	)	Judge Guzman
	)	Magistrate Judge Cox
FORD MOTOR COMPANY,	)	
	)	
Defendant.	)	

**JOINT INITIAL STATUS REPORT**

**A. Nature of the Case:** Plaintiff Tyrone Lloyd brings claims of race discrimination and retaliation against defendant Ford Motor Company. More specifically, plaintiff claims that Ford failed to promote him in 1999 and again in 2004 and that these failures were based on his race or his filing of a lawsuit in 1998.

**1. Bases for jurisdiction, nature of the claims and counterclaims.**  
Plaintiff alleges that this Court has federal question subject matter jurisdiction as his claims are asserted under Title VII and 42 U.S.C. § 1981. There is currently no counterclaim.

**2. Major legal issues.** Whether plaintiff's claims are barred by the applicable statutes of limitations, administrative prerequisites and/or a prior settlement agreement between the parties. Whether plaintiff can state a prima facie case of race discrimination and whether he can prove that Ford's legitimate, non-discriminatory reasons for its actions are merely a pretext for unlawful discrimination.

**3. Major factual issues.** The factual details surrounding plaintiff's allegations. Whether plaintiff sustained any damages as a result of these alleged actions, and, if so, the extent of such damage. Ford's reasons for taking the actions it did, including but not limited to its reasons for selecting individuals to fill certain job classifications.

**B. Proposed Discovery Schedule:** The parties jointly propose the scheduling order include the following dates:

1. Information required by Rule 26(a) exchanged on or before September 15, 2008;
2. All amendments to pleadings and joinder of parties by September 30, 2008;

3. All discovery commenced in time to be completed by April 20, 2009;
4. Plaintiff's disclosure of experts pursuant to Rule 26(c) on or before January 30, 2009;
5. Defendant's disclosure of experts pursuant to Rule 26(c) on or before March 16, 2009;
6. Dispositive motions filed on or before May 20, 2009;
7. Ford anticipates that it will seek entry of a protective order;
8. The parties have discussed the discovery and production of electronically stored information as contemplated by the Court's rules and agree that information shall be produced in either hard copy or in .tiff format. If, after production, the other party desires the electronically stored information in a different format, the parties agree to further discuss any such issues in a meet and confer setting as contemplated by the Federal Rules of Civil Procedure. Should the parties be unable to agree on the subsequent form of production after these efforts, the parties will file an appropriate motion with the Court.

**C. Trial Status:**

1. Plaintiff has requested a jury trial,
2. The parties anticipate that the case will take 4-5 days to try,

**D. Consent to Magistrate:**

The parties do not unanimously consent to a magistrate.

**E. Settlement Status:**

To date the parties have not engaged in settlement negotiations.

Respectfully submitted,

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